

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: FTX TRADING LTD., <i>et al.</i> , ¹ Debtors.	Chapter 11 Case No. 22-11068 (JTD) (Jointly Administered)
In re: DIGITAL CUSTODY INC., Debtor.	Chapter 11 Case No. 22-11115 (JTD) Ref. No. 26131

CERTIFICATION OF COUNSEL

I, Matthew R. Pierce, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On October 1, 2024, the Debtors filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Motion of Debtors for Entry of an Order Dismissing the Chapter 11 Case of Digital Custody Inc.* [D.I. 26131] (the “Motion”).²

2. Pursuant to the Notice of Motion attached to the Motion [D.I. 26131-1], any responses to the Motion were to be filed no later than October 15, 2024, at 4:00 p.m. (ET) (the “Response Deadline”).

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

² Capitalized terms used but otherwise not defined herein shall have the meanings ascribed to them in the Motion.

3. As of the Date hereof, no formal responses or other responses to the Motion have been filed or served on the Debtors.

4. The Debtors received comments from Court regarding the form of the proposed order filed with the Motion (the “Proposed Order”). The Debtors have revised the Proposed Order to address the Court’s comments (the “Revised Interim Order”), a copy of which is attached hereto as **Exhibit A**. A copy of the Revised Interim Order compared against the Proposed Order is attached hereto as **Exhibit B**. A copy of the proposed final order, which is attached as Exhibit 1 to the Revised Interim Order, compared against the Proposed Order is attached hereto as **Exhibit C**.

5. The Revised Interim Order has been circulated to counsel to the Office of the United States Trustee (the “U.S. Trustee”) and the Official Committee of Unsecured Creditors (the “Committee”), who have advised that they have no objection to entry of the Revised Interim Order. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Interim Order shall be uploaded to CM/ECF.

6. Accordingly, the Debtors respectfully request that the Court enter the Revised Interim Order at its earliest convenience.

Dated: October 30, 2024
Wilmington, Delaware

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/s/ Matthew R. Pierce

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